channels 2-51.⁷¹ In contrast, there are 11 Los Angeles market stations that have been assigned two channels <u>within</u> the core spectrum. As a result of its channel assignments, KRCA would be required to return both its channels and cannot use either one for a permanent DTV station.

A. The Commission's Requirement that KRCA Return Both its Television Channels Violates the Communications Act.

The Commission's assignment of two channels outside the core is contrary to the express language of the Telecommunications Act of 1996, which provides that "[i]f the Commission grants a license for advanced television services . . . the Commission shall, as a condition of such license, require that either the additional license or the original license held by the licensee be surrendered." Congress was thus explicit that either the DTV or NTSC license must be surrendered, and, therefore, indicated that television stations should have at least one channel assignment which can be retained. The assignment of DTV Channel 69 to KRCA violates this statutory provision.

⁷¹ See Exhibit 2. The Commission has not yet resolved the boundaries of core spectrum for DTV. Sixth R&O, ¶ 83. As a result, two additional stations in the market may have no core spectrum assignment, depending upon whether the core is at 2-46 or 7-51. KRCA is in an uniquely disadvantageous position because it must operation two channels within channels 60-69.

⁷² 47 U.S.C. § 336(c) (emphasis supplied).

B. The Assignment of Two Channels Outside the Core Spectrum to KRCA Is Arbitrary and Capricious.

The Commission's DTV assignment places KRCA at an immediate disadvantage with respect to every other station in the Los Angeles market.

Unlike other Los Angeles stations, KRCA is the only one faced with the certainty that it will be forced to terminate service on both its television channels⁷³. Thus, KRCA has been denied the Commission-recognized advantages to "establish early and permanent channel identification with viewers" and to "minimize the expense and confusion associated with second channel transitions."

The Commission has provided no explanation of its decision to deny these advantages to KRCA alone in the Los Angeles market, particularly where so many other stations in the market have been assigned <u>two</u> core spectrum channels.

Thus, the Commission has articulated no rational basis for treating KRCA differently from the other stations, and the decision to do so is arbitrary and capricious on its face.⁷⁵

⁷³ See Exhibit 2.

⁷⁴ Sixth NPRM, ¶ 24.

⁷⁵ See Public Media Center v. FCC, 587 F.2d 1322, 1331 (D.C. Cir. 1978); Melody Music, Inc. v. FCC, 345 F.2d 730,733 (D.C. Cir. 1965).

C. The Commission Has Unlawfully Precluded any Opportunity for Meaningful Review of the Basis for Its DTV Channel Assignment.

While the Commission has suggested that its allotment methodology disfavored the assignment of two channels outside the core,⁷⁶ it is impossible for KRCA to determine from the limited information contained in the <u>Sixth Report</u> and <u>Order</u> the operation of the assignment algorithm or its application to KRCA. KRCA has been substantially hampered in its efforts to review and evaluate the Commission's action by the Commission's failure to release the technical data necessary to analyze the assignment methodology.

The Administrative Procedure Act requires an agency to disclose in its statement of basis and purpose sufficient detail about its factual and policy decisions to permit meaningful review of its action. The Commission has failed to do so in this case, and has thus denied KRCA a reasonable opportunity to review its channel assignment decision. KRCA reserves its right to supplement its petition for reconsideration when the Commission has released the necessary information on its assignment methodology.

⁷⁶ Sixth Report and Order, at ¶ 207.

See Home Box Office, Inc. v. FCC, 567 F.2d at 35-36. The Commission's failure also precludes effective judicial review: "'[T]he failure of an administrative agency to articulate the reasons for a particular decision makes meaningful review of that decision impossible." Public Media Center v. FCC, 587 F.2d at 1331-32 (quoting American Smelting & Refining Co. v. FPC, 494 F.2d 925, 945 (D.C. Cir. 1974))..

CONCLUSION

The Commission's assignment of DTV Channel 69 to KRCA is error. The Commission should modify the DTV Table to the extent necessary to provide KRCA with a viable DTV channel.

Respectfully submitted,

FOUCE AMUSEMENT **ENTERPRISES**

John I. Stewart, Jr. William D. Wallace David D. McCurdy

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(202) 624-2500

Its Counsel

June 13, 1997

DECLARATION

I, Christopher Buchanan, chief engineer of KRCA-TV, hereby declare under penalty of perjury that I have read the foregoing Petition For Reconsideration and that the facts contained therein are true and accurate to the best of my information, knowledge and belief.

Christopher Buchanan, Chief Engineer

KRCA-TV

Date: June 12, 1997

ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RECONSIDERATION
MM DOCKET 87-268
ON BEHALF OF
FOUCE AMUSEMENT ENTERPRISES, INC.

JUNE 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, DC

This engineering statement has been prepared on behalf of Fouce Amusement Enterprises, Inc. (Fouce) in support of its Petition for Reconsideration of the FCC's Sixth Report and Order in MM Docket No. 87-268, in the matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service adopted by the Federal Communications Commission ("Commission"). Fouce is currently licensed to operate NTSC station KRCA, Channel 62, Riverside, California. The transmitting facility for KRCA is located on the Sunset Ridge Electrical Park overlooking Los Angeles, California and the surrounding area.

KRCA has authorized this firm to conduct studies and review the various aspects of the Sixth Report and Order as it applies to KRCA. This study was conducted on the impact of the Sixth Report and Order on KRCA's current NTSC service area and the interference which could result to existing service by new digital operations and the service replication by the assigned digital television ("DTV") operation.

In Table 1 of Appendix B to the Sixth Report and Order, the Commission allocated DTV Channel 69 (800-806 MHZ) with 175 kW average power to KRCA at Sunset Ridge. As discussed below, use of Channel 69 for DTV broadcasting from Sunset Ridge is highly inappropriate due to harmful interference that is predicted between DTV Channel 69 and adjacent channel Land Mobile Operations in the band 806-812 MHZ.

14-20 in 13 urbanized areas, the Gulf of Mexico offshore region, and Hawaii. The FCC concluded that its proposed minimum cochannel and adjacent channel separation distances between DTV and existing land mobile operations on channels 14 to 20 are appropriate for avoiding interference and ensuring the operation of both DTV and land mobile services. The minimum cochannel and adjacent channel separation distances adopted were 250 km and 176 km respectively.

However, no similar separation distances were adopted regarding potential interference between DTV operations on Channel 14 and Channel 69 and land mobile operations in the adjacent 6 MHZ band below Channel 14 and the adjacent 6 MHZ band above Channel 69. This is quite unfortunate because the potential for interference between these DTV operations and the adjacent land mobile operations is as great as the potential interference related to land mobile operations in the shared channels 14-20 in the 13 urbanized areas.

Potential of Interference between KRCA, Channel 69 and LM Operations.

DTV Channel 69 which was allotted to KRCA extends from 800-806 MHZ. As shown in Section 90.613 of the FCC rules, the spectrum 806-824 MHZ is allocated to land mobile services for mobile and control frequencies. The base station transmitting frequencies related to these mobile and control frequencies are allocated 45 MHZ higher in the 851-869 MHZ spectrum. The channels available for assignment to land mobile stations are 25 kHz wide beginning at 806.0125 MHZ, only 12.5 kHz above the band edge of channel 69 and well within the out-of-band mask for Channel 69.

As shown in Appendix A of this Statement, there are numerous land mobile operations in the Los Angeles area which utilize the spectrum from 806-812 MHZ. Therefore the potential for interference to KRCA DTV transmissions from mobile and control stations assigned to this spectrum is significant. Moreover, the input receive frequencies for the base stations associated with these mobile and control stations are in the band 806-812 MHZ. It is particularly noteworthy in Appendix A that there are numerous base stations using 806-812 MHZ receive frequencies that are approximately collocated on Sunset Ridge with KRCA. Calculations demonstrate that the potential for harmful interference to the mobile and control stations received by these land-mobile base stations is significant. For example, the following calculations were performed for the receive frequency of 806.0875 MHZ used by a base station located on Sunset Ridge:

KRCA Average Power

175 kW

(52.4 dBk)

(82.4 dBm)

Min Mask Attenuation

46.005 dB

Power Density in 25 kHz LM CH

12.6 dBm

For the 811.7875 MHZ land mobile channel, the calculations indicate that the power density in 25 kHz is -10.7 dBm. The remaining receiver frequencies for the band 806-812 MHZ used on Sunset Ridge are distributed between these two extremes.

While path attenuation losses between KRCA and the base stations on Sunset Ridge will further attenuate the interfering signals, such losses are at a minimum due to the close proximity of KRCA¹. Therefore, all receivers on Sunset Ridge operating in this adjacent band will be subjected to serious harmful interference. Due to their close proximity to KRCA, it is also anticipated that interference to receive frequencies above 812 MHZ is likely. Such interference can include direct interference, receiver desensitization, spurious receiver responses, conducted interference, etc. The typical receiver sensitivity is in the -100 dBm range or better. Obviously, the disparity in these numbers is sufficient to make any consideration of a Ch. 69 DTV operation not acceptable engineering practice.

Steps to eliminate interference are not believed to be practical. For example, even a power reduction of 20 dB by KRCA to an average power of 1.75 kW would not be

¹It is estimated that the path attenuation to the land mobile receiver location on Sunset Ridge is between 84 dB and 80 dB. Therefore, without considering gain characteristics of the receiving antenna, the potential interfering signal from KRCA to the receivers is estimated to be within -71 dBm to -90 dBm for 25 kHz, depending upon frequency.

sufficient to significantly reduce the potential for interference to land mobile services. In addition, as KRCA's average power is reduced, the potential interference to KRCA's service from mobiles and control stations is increased. Direct interference and conducted interference from energy in the DTV sideband cannot be solved by outboard filtering at the land mobile receiver inputs. Additionally, filtering on the inputs of receivers reduces the performance of the receivers.

Fouce has considered moving its planned DTV operations to Mt Wilson. However, as shown in Appendix A of this Statement Channel 69 is no more usable at Mt Wilson than it is at Sunset Ridge due to a large number of land-mobile operations with receivers in the band 806-812 MHZ. Moreover, the potential interference to KRCA's Channel 69 transmissions from Mt Wilson from mobile and control stations would remain as great as that discussed for Sunset Ridge.

Clearly the only recourse is identification of a replacement DTV channel for Channel 69. It will facilitate the allotment of a DTV channel to KRCA as well as the allotment of DTV channels in general to the Los Angeles area if it is assumed that KRCA will initiate DTV operations from MT Wilson rather than Sunset Ridge where its NTSC operation is presently located. Such collocation will provide greater flexibility by eliminating some of the potential interference conflicts that exist related to DTV operations from Sunset Ridge.

KRCA attended all the regional broadcast caucus meetings. It requested changes (among which was a change to Mt. Wilson) for its facilities in that forum. To this date, KRCA has not received any response.

For these reasons, it is requested that the Commission amend the DTV Table in Table 1 of Appendix B of the Sixth Report and Order in order to specify a DTV channel that is not encumbered with the potentially fatal flaws discussed in this Statement.

EVALUATION CONCERNS

Existing KRCA service is complemented in outlying areas by cable. It is not certain how the Commission procedures for the implementation of DTV operations for the transition period will identify and protect these augmented current KRCA NTSC service areas.

There is presently difficulty in assessing KRCA's coverage areas because the full details of the Commission's implementation of the Longley-Rice model are not available.

New Section 73.622(d) states that these details are available in OET Bulletin No. 69, which has not yet been issued.

There are a number of issues concerning the implementation of the Longley-Rice model and other related studies that are important considerations when assessing the results of the FCC's calculations for individual stations. Such issues include the confidence factor used in the studies, the size of the individual cells studied and whether these sizes are H:\wp70\don\krca02.eng.wpd

appropriate for some terrain conditions, the manner of selecting the centroids for population calculations, etc.

It is recognized that the FCC had to assume implementation criteria for the country as a whole, even if individual situations may exist where other criteria might be more appropriate. For this reason and because OET Bulletin 69 is not yet available, the Commission is encouraged to adopt a flexible mode in dealing with individual allotment problems that are identified in the new DTV allotment table after the new rules and the DTV Table of Allotments go into effect.

Without full knowledge of the Commission's calculation methodology for service and interference and the DTV frequency assignments prevents KRCA from making critical independent evaluation of what impact any DTV operation may have on its NTSC current service.

BORDER ISSUE

The Report and Order indicates that negotiations are underway regarding Mexico.

These negotiations have a direct impact on the DTV assignments for southern California.

Therefore, KRCA's DTV assignment faces uncertainty until the U.S.-Mexican DTV coordination is finalized.

RX FREQ	TX FREQ	CALL	SERV	LICNENSEE	TX ADDRESS	CITY	LAT	LONG	CLASS
806.0875	851.0875	KLS303	GB	HOFFMAN SOUTHWEST CO	SUNSET RIDGE	POMONA	341117	1174216	FB2
806.4125	851.4125	WNPY680	GX	SOBEL, MARC	SUNSET PEAK	UPLAND	341117	1174216	FB2C
806.6875	851.6875	WZA814	GB	LOS ANGELES, COUNTY OF	SUNSET PEAK	UPLAND		1174216	
806.7875	851.7875	WNHJ729	GX	ARDIS COMPANY	SUNSET RIDGE	GLENDORA	341117	1174216	FB6C
807.0875	852.0875	KNJN336	GB	ATHENS DISPOSAL	SUNSET PEAK	UPLAND		1174216	·
807.0875	852.0875	WNXB280	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND	 	1174216	
807.9875	852.9875	WYQ523	GB	HERNANDEZ CONCRETE INC	SUNSET RIDGE	CLAREMONT		1174216	
807.9875	852.9875	WNVW779	GX	KAY JR; JAMES A	SUNSET PEAK	UPLAND		1174216	
807.9875	852.9875	WNVW779	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		1174216	
807.9875	852.9875	WDV754	GB	SMART SMR OF CALIFORNIA	SUNSET RIDGE	CLAREMONT		1174216	
808.1375	853.1375	WPFH460			SUNSET PEAK	UPLAND	 	1174216	
808.4875	853.4875	WNVQ272	GX	TELEPHONE CONNECTION O	SUNSET RIDGE	UPLAND		1174216	
808.6375	853.6375	WNIZ676	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND	 	1174216	
808.8125	853.8125	WDS211	GB	S P L SALE & SERVICE INC	SUNSET RIDGE	UPLAND	341117	1174210	FB4
808.8125	853.8125	WPDV647	GB	CTFINC	SUNSET RIDGE	UPLAND	341117	1174210	FB4
808.9125	853.9125	WNXW280	GX_	KAY JR, JAMES A	SUNSET PEAK	UPLAND	341117	1174216	FB2C
808.9625	853.9625	WPBZ518	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		1174216	
809.1625	854.1625	KNEM323	GB .	ARDIS COMPANY	SUNSET PEAK 15 KM N	GLENDORA	341117	1174216	FB6C
809.6625	854.6625	WNHJ729	GX .	ARDIS COMPANY	SUNSET RIDGE	GLENDORA	341117	1174216	FB2C
809.7125	854.7125	NNZZ731	GX I	KAY JR, JAMES A	SUNSET PEAK	UPLAND	341117	1174216	FB2C
809.8625	854.8625 P	KNDB927	GO I	PENHALL INTERNATIONAL	SUNSET PEAK	UPLAND	341117	1174216	FB2
810.0125	855.0125 P	(NEM322	GB /	ARDIS COMPANY	SUNSET RIDGE	GLENDORA	341117	1174216	FB6C
810.3875	855.3875	(NEM323	GB /	ARDIS COMPANY	SUNSET PEAK 15 KM N	GLENDORA	341117	1174216	FB6C
810.7625	855.7625 H	(NEP581	GB /	API SECURITY INC	SUNSET PEAK	UPLAND	341117	1174216	FB2
810.8375	855.8375 H	(NEM323	GB /	ARDIS COMPANY	SUNSET PEAK 15 KM N	GLENDORA	341117	1174216	FB6C
810.8875	855.8875 K	NJH406	GO (CNF TRANSPORTATION INC	SUNSET PEAK	UPLAND	341117	1174216	FB2
811.0375	856.0375 V	VYA665	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2
811.0375	856.0375 V	VPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
811.0625	856.0625 V	VPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
811.7875	856.7875 K	(NIH390	GB L	LEE & STIRES	SUNSET RIDGE	CLAREMONT	341111	1174208	FB4
811.7875	856.7875 V	VNKN995	GB E	BUDKA ASPHALT MAINT CO	SUNSET RIDGE	CLAREMONT	341111	1174208	FB4
811.7875	856.7875 V	VNLT207	GB H	HAMILTON TRUCKING INC	SUNSET RIDGE	CLAREMONT	341111	174208	FB4
811.7875	856.7875 V	VPDU521	GB F	RADIO DISTPATCH CORP	SUNSET RIDGE	CLAREMONT	341111	174208	FB4

6/11/97

RX FREQ	TX FREQ	CALL	SERV	LICNENSEE	TX ADDRESS	CITY		LONG	
811.7875	856.7875	WPJT696	GB	STATE FARM MUTUAL AUTO	3333 HYLAND AVE	COSTA MESA			
811.7875	856.7875	WPJT696	GB	STATE FARM MUTUAL AUTO	3333 HYLAND AVE	COSTA MESA	341111	1174208	FB2T
811.7875	856.7875	KNHC710	GB	SUPERIOR CONSTRUCTION	SUNSET RIDGE	SUNSET RIDG	341117	1174216	FB4
811.7875	856.7875	WNCS265	GB	L BARRIOS AND ASSOCIATE	SUNSET RIDGE	CLAREMONT	341111	1174208	FB4
812.0125	857.0125	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
812.0375	857.0375	WYA665	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA		1174216	
812.0375	857.0375	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
812.0625	857.0625	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
812.3375	857.3375	KNJH406	GO	CNF TRANSPORTATION INC	SUNSET PEAK	UPLAND	341117	1174216	FB2
812.7875	857.7875	KNHK875	GB	LAIDLAW TRANSIT	SUNSET RIDGE	CLAREMONT	341117	1174216	FB4
812.7875	857.7875	WNAR360	GB	LAND CARE INC	SUNSET RIDGE	CLAREMONT	341111	1174208	FB4
812.7875	857.7875	WNRU770	GB	PHOENIX PRINTING	SUNSET RIDGE	CLAREMONT	341111	1174208	FB4
813.0125	858.0125	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA		1174216	
813.0375	858.0375	WYA665	YX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2
813.0375	858.0375	WPCZ854	YX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
813.0625	858.0625	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
813.3625	858.3625	KNHQ807	GO	TAXI SYSTEMS INC	SUNSET PEAK	POMONA	341117	1174216	FB2
814.0125	859.0125	WPCZ854	ΥX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
814.0375	859.0375	WYA665	YX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2
814.0375	859.0375	WPCZ854	YX	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
814.0625	859.0625	WPCZ854	YX :	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
815.0125	860.0125	WPCZ854	YX :	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
815.0375	860.0375	WYA665	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2
815.0375	860.0375	WPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
815.0625	860.0625	WPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
815.7875			 	WESTEC SECURITY INC	SUNSET PEAK	UPLAND	341117	1174216	FB2
815.8625	860.8625	KNEC212	GB F	EDERAL EXPRESS CORPO	SUNSET PEAK	SUNSET RIDG	341117	1174216	FB2
816.4875	861.4875	WYA665	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2
816.4875	861.4875	NPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C
816.7625	861.7875	NPCZ854	YX S	SMART SMR OF CALIFORNIA	SUNSET PEAK	PAMONA	341117	1174216	FB2C

RX FREO	TXFREQ CALL	SERV	LICNENSEE # 18 W	PROSTX ADDITIES SEED	SERVICE PROSE	Committee Commit	
806.0875	851.0875 KLS303	GB	HOFFMAN SOUTHWEST COR	SUNSET RIDGE	POMONA	341117 1174216	
806.0875	851.0875 KLS303	GB	HOFFMAN SOUTHWEST COR	JOHNSTONE PEAK 2	SAN DIMAS	0 100 10 111 100	FB2
806.2875	851.2875 WYK281	GO	PANNONE, PEARL	JOHNSTONE PEAK	SAN DIMAS	0.00.0	FB2
806.4125	851.4125 WNPY680	GX	SOBEL, MARC	SUNSET PEAK	UPLAND		FB2C
806.5	851.5WPHZ291	YP	SAN BERNARDINO CA, COUN	7878 ALMOND RD	RANCHO CUCA		FB2S
806.6875	851.6875 WZA814	GB	LOS ANGELES, COUNTY OF	SUNSET PEAK	UPLAND		FB2
806.7875	851.7875 WNHJ729	GX	ARDIS COMPANY	SUNSET RIDGE	GLENDORA		FB6C
807.0875	852.0875 KNJN336	GB	ATHENS DISPOSAL	SUNSET PEAK	UPLAND		FB2C
807.0875	852.0875 WNXB280	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		FB2C
807.9875	852.9875 WNVW779		KAY JR, JAMES A	JOHNSTONE PEAK	GLENDORA	0.00.0	FB2C
807.9875	852.9875 WYQ523	GB	The state of the s	SUNSET RIDGE	CLAREMONT		FB4
807.9875	852.9875 WNVW779	i	KAY JR, JAMES A	SUNSET PEAK	UPLAND	12	FB2C
807.9875	852.9875 WNVW779		KAY JR, JAMES A	SUNSET PEAK	UPLAND		FB2J
807.9875	852.9875 WNVW779		KAY JR, JAMES A	JOHNSTONE PEAK	GLENDORA		FB2C
	and the second s	GB	SMART SMR OF CALIFORNIA	SUNSET RIDGE	CLAREMONT	011111	FB4
808.1375		GX	SOBEL, MARC	SUNSET PEAK	UPLAND		FB2C
808.4875		GX	TELEPHONE CONNECTION OF	SUNSET RIDGE	UPLAND		FB2C
808.6375	853.6375 WNIZ676	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		FB2C
		GB	CTFINC	SUNSET RIDGE	UPLAND	011111	FB4
	,	GB	S P L SALE & SERVICE INC	SUNSET RIDGE	UPLAND		FB4
		GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		FB2C
808.9625	and the second s	GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND		FB2C
809.1625		GB	ARDIS COMPANY	SUNSET PEAK 15 KM	GLENDORA		FB6C
809.6625	The second secon	GX	ARDIS COMPANY	SUNSET RIDGE	GLENDORA	341117 1174216	
		GX	KAY JR, JAMES A	SUNSET PEAK	UPLAND	341117 1174216	+
809.8625	854.8625 KNDB927	GO	PENHALL INTERNATIONAL	SUNSET PEAK	UPLAND	341117 1174216	
:		GB	ARDIS COMPANY	SUNSET RIDGE	GLENDORA		FB6C
810.3875	855.3875 KNEM323	GB	ARDIS COMPANY	SUNSET PEAK 15 KM	GLENDORA		FB6C
810.7625	855.7625 KNEP581	GB	API SECURITY INC	SUNSET PEAK	UPLAND		FB2
810.8375	855.8375 KNEM323	GB	ARDIS COMPANY	SUNSET PEAK 15 KM	GLENDORA	341117 1174216	FB6C
810.8875	855.8875 KNJH406	GO	CNF TRANSPORTATION INC	SUNSET PEAK	UPLAND		FB2
i	856.0375 WYA665	ΥX	SMART SMR OF CALIFORNIA I	I the second sec	PAMONA		FB2
811.0375	856.0375 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 1174216	FR2C

RX FREG	TXFREO CALL	SER	V LICHENSEE	# TX ADDRESS	LE SECUTIVES	FLATER	(6)\{6}	
	856.0625 WPCZ854	ΥX	SMART SMR OF CALIFORNIA		PAMONA	341117 117	74216	FB2C
811.7875	856.7875 WPJT696	GB	STATE FARM MUTUAL AUTOM	13333 HYLAND AVE	COSTA MESA	341111 117	74208	FB4
811.7875	856.7875 WNLT207	GB	HAMILTON TRUCKING INC	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
1	856.7875 WNCS265	GB	L BARRIOS AND ASSOCIATES	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
811.7875	856,7875 WPJT696	GB	STATE FARM MUTUAL AUTOM	3333 HYLAND AVE	COSTA MESA	341111 117	74208	FB2T
811.7875	856.7875 KNHC710	GB	SUPERIOR CONSTRUCTION	SUNSET RIDGE	SUNSET RIDGE	341117 117	74216	FB4
811.7875	856.7875 WPDU521	GB	RADIO DISTPATCH CORP	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
811.7875	856.7875 KNIH390	GB	LEE & STIRES	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
812.0125	857.0125 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	74216	FB2C
812.0375	857.0375 WYA665	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	74216	FB2
812.0375	857.0375 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	74216	FB2C
812.0625	857.0625 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	74216	FB2C
812.3375	857.3375 KNJH406	GO	CNF TRANSPORTATION INC	SUNSET PEAK	UPLAND	341117 117	74216	FB2
812.7875	857.7875 KNHK875	GB	LAIDLAW TRANSIT	SUNSET RIDGE	CLAREMONT	341117 117	74216	FB4
812.7875	857.7875 WNRU770	GB	PHOENIX PRINTING	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
812.7875	857.7875 WNAR360	GB	LAND CARE INC	SUNSET RIDGE	CLAREMONT	341111 117	74208	FB4
812.0125	858.0125 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	74216	FB2C
812.0375	858.0375 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
812.0375	858.0375 WYA665	YX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2
812.0625	858.0625 WPCZ854	YX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
812.3625	858.3625 KNHQ807	GO	TAXI SYSTEMS INC	SUNSET PEAK	POMONA	341117 117	4216	FB2
813.0125	859.0125 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
813.0375	859.0375 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
813.0375	859.0375 WYA665	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2
813.0625	859.0625 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
813.5125	859.5125 WPCP444	ΥX	SMART SMR OF CALIFORNIA I	1837 W 11TH	UPLAND COOP	340613 117	4109	FB2C
813.5125	859.5125 WPCC969	ΥX	SMART SMR OF CALIFORNIA I	4.5 MI N SR31 & SR56	RANCHO CUCA	340544 117	3416	FB2C
813.7375	859.7375 KNCM771	GP	CALIFORNIA, STATE OF	JOHNSTONE PEAK 4	SAN DIMAS	340937 117	4754	FB2
813.7375	859.7375 KNCM771	GP	CALIFORNIA, STATE OF	JOHNSTONE PEAK 4	SAN DIMAS	340937 117	4754	FB
813.925	859.925 WPHZ291	ΥP	SAN BERNARDINO CA, COUN	7878 ALMOND RD	RANCHO CUCA	340945 117	3802	FB2S
814.0125	860.0125 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
814.0375	860.0375 WPCZ854	ΥX	SMART SMR OF CALIFORNIA I	SUNSET PEAK	PAMONA	341117 117	4216	FB2C
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821.3	867.3 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
	867.3875 WPDK403 Y		SAN BERNARDINO, COUNTY	7878 ALMOND RD	RANCHO CUCA	340945 1173802	
821.4375	867.4375 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
821.4375	867.4375 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
821.5875	867.5875 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
821.5875	867.5875 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
821.6125	867.6125 WPDK403 Y		SAN BERNARDINO, COUNTY	7878 ALMOND RD	RANCHO CUCA	340945 1173802	+ · · · · · · ·
821.6625	867.6625 WPDK403 Y		SAN BERNARDINO, COUNTY	7878 ALMOND RD	RANCHO CUCA	340945 1173802	
821.725	867.725 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	
821.725	867.725 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	*
821.75	867.75 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	4
821.75	867.75 WNNM912 Y	;	LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	1.
821.775	867.775 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	i
821.775	867.775 WNNM912 Y		LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	1
821.8	867.8 WNNM912 Y	!	LOS ANGELES, COUNTY OF	JOHNSTONE PEAK	SAN DIMAS	340937 1174753	FB2